

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>Free Speech Systems LLC</b>	§	<b>Subchapter V</b>
	§	
<b>Debtor.</b>	§	<b>Case No. 22-60043 (cml)</b>

---

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

---

**In re:**

**NEIL HESLIN, SCARLETT LEWIS,  
LEONARD POZNER, VERONIQUE DE  
LA ROSA, MARCEL FONTAINE,**

**Plaintiffs,**

**v.**

**ADVERSARY NO. 22-06017**

**ALEX E. JONES, FREE SPEECH  
SYSTEMS, LLC, PQPR HOLDINGS  
LIMITED, LLC, PLJR HOLDINGS, LLC,  
PLJR HOLDINGS LIMITED, LLC,  
CAROL JONES, DAVID JONES, AEJ  
HOLDINGS, LLC AEJ TRUST 2019,**

**Defendants.**

**DAVID WHEELER, FRANCINE  
WHEELER, JACQUELINE BARDEN,  
MARK BARDEN, NCOLE HOCKLEY,  
IAN HOCKLEY, JENNIFER HENSEL,  
DONNA SOTO, CARLEE SOTOPARISI,  
CARLOS M. SOTO, JILLIAN SOTO,  
WILLIAM SHERLACH, ROBERT  
PARKER, WILLIAM ALDENBERG,**

**Intervenors.**

---

**TEXAS PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE  
TO EXCEED PAGE LIMITS**

---

1. Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (the “Texas Plaintiffs”), creditors and parties in interest in the above-captioned case, seek leave of Court to file a motion to abstain from hearing the subject matter of this adversary proceeding and to remand this action that exceeds 10 pages.

2. Plaintiffs comprise Sandy Hook Families who originally sued Alex Jones, notorious conspiracy theorist, and his media empire for spreading the absurd lie that the horrific shooting at Sandy Hook Elementary was a hoax and that these parents of slain first graders were mere crisis actors. In the course of that litigation, the Texas Plaintiffs learned that Defendants were fraudulently transferring assets to become judgment-proof. The Texas Plaintiffs therefore brought claims under the Texas Uniform Fraudulent Transfer Act (the “TUFTA Case.”).

3. The TUFTA Case was originally filed in Travis County state court—specifically in the 200th Judicial District Court of Travis County, Texas. The Debtor then removed the TUFTA Case to this Court. The Texas Plaintiffs now seek to remand this case back to state court, under the operative permissive-abstention doctrine. The doctrine, however, involves an analysis of 14 different factors.

4. Despite their best efforts, the Texas Plaintiffs could not confine their 14-factor analysis to the 10-page limit set by Local Rule 7007. Under that rule, any non-dispositive motion exceeding 10 pages must be authorized by the Court. To ensure the 14 factors are addressed thoroughly for the Court’s benefit (without needlessly lengthening that analysis) the Texas Plaintiffs’ motion is 15 pages. Under Local Rule 7007, the Texas Plaintiffs therefore seek leave

to allow their motion to abstain and remand to exceed the 10-page limit. The motion to abstain and remand is attached as **Exhibit A** to this motion.

5. Counsel for the Texas Plaintiffs has conferred with counsel for the Debtor, and the Debtor is unopposed to the Texas Plaintiffs having leave to file a 15-page motion to abstain and remand.

WHEREFORE, as this motion for leave is unopposed, and the relief sought in this motion will not unduly prejudice the parties or create any needless delay in the adjudication of this case, the Texas Plaintiffs respectfully request that the Court grant the Texas Plaintiffs leave to file a 15-page motion to abstain and remand and that the Court file the motion attached as **Exhibit A** (including its exhibits) to this motion with the clerk of Court.

Dated: November 28, 2022

Respectfully submitted,

**MCDOWELL HETHERINGTON LLP**

Avi Moshenberg  
Texas Bar No. 24083532  
1001 Fannin Street, Suite 2700  
Houston, Texas 77002  
D: 713-337-5580  
F: 713-337-8850  
E: [Avi.Moshenberg@mhllp.com](mailto:Avi.Moshenberg@mhllp.com)

*Counsel for the Texas Plaintiffs*

and

**CHAMBERLAIN, HRDLICKA, WHITE,  
WILLIAMS & AUGHTRY, PC**

By: /s/ Jarrod B. Martin

Jarrod B. Martin

Texas Bar No. 24070221

1200 Smith Street, Suite 1400

Houston, Texas 77002

D: 713.356.1280

F: 713.658.2553

E: jarrod.martin@chamberlainlaw.com

***Bankruptcy Counsel for the Texas Plaintiffs***

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing motion has been served upon all parties eligible to receive electronic notice of filings through the Court's CM/ECF system on November 27, 2022, which may include the following:

Raymond W. Battaglia  
[rbattagliaw@outlook.com](mailto:rbattagliaw@outlook.com)  
LAW OFFICE OF RAYMOND W. BATTAGLIA  
66 Granburg Circle  
San Antonio, Texas 78218

F. Andino Reynal  
[areynal@frlaw.com](mailto:areynal@frlaw.com)  
FERTITTA & REYNAL LLP  
917 Franklin St., Ste. 600  
Houston, Texas 77002

Shelby Jordan  
[sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com)  
JORDAN & ORTIZ, P.C.  
500 N. Shoreline Blvd., Ste. 900  
Corpus Christi, Texas 78401

Stephen Lemmon  
[lemmon@slollp.com](mailto:lemmon@slollp.com)  
STREUSAND, LANDON, OZBURN & LEMMON, LLP  
1801 S. MoPac Expwy., Suite 320  
Austin, Texas 78746

Stephen A. Roberts  
[sroberts@srobertslawfirm.com](mailto:sroberts@srobertslawfirm.com)  
STEPHEN A. ROBERTS, PC  
1400 Marshall Lane  
Austin, Texas 78703

Ryan E. Chapple  
[rchapple@cstrial.com](mailto:rchapple@cstrial.com)  
CAIN & SKARNULIS PLLC  
303 Colorado Street, Suite 2850  
Austin, Texas 78701

/s/ Jarrod B. Martin  
Jarrod B. Martin